REMARKS

Applicant has carefully considered the August 8, 2006 Office Action regarding the above-identified application, and the claim amendments above together with these remarks are presented in a bona fide effort to respond thereto and address all issues raised in that Action. The independent claims have been amended to more clearly distinguish over art, and several dependent claims are amended to conform to the revised independent claim language. Care has been taken to avoid introduction of new matter. Favorable reconsideration is respectfully requested.

Summary of the Latest Action

The August 8, 2006 Office Action included a rejection of claims 9-36 over a combination of U.S. Patent No. 6,581,108 to Denison et al. (hereinafter Denison) in view of U.S. Patent No. 6,832,322 to Boden et al. (hereinafter Boden). Although initially stated as an anticipation rejection under 35 U.S.C. §102, the detailed explanation sets forth the rationale for an obviousness rejection (see first two paragraphs on page 4 of the Action).

The Action also rejected claims 9, 10, 14, 17-20, 27-30, 33 and 36 under 35 U.S.C. §103 as unpatentable over U.S. Patent No. 6,892,245 to Crump et al. (hereinafter Crump) in view of Boden.

These rejections are traversed

Introduction

Before discussing claim distinctions over the art, it may be helpful to consider the subject matter disclosed in this case. The case relates to a management communication between elements on two different networks, using a certain address translation technique. A feature of the disclosed technique resides in that a "real address" which is a transmission source address contained in a management protocol packet sent from a monitored apparatus is translated into a

"management address" which is a virtual address undefined by NAT. In other words, in the disclosed methodology, the monitored apparatus is managed by a management address which is a virtual address (the third address system) different from a local address (the first address system) and a global address (the second address system) both of which are defined by the NAT.

With such an approach, it is not necessary to assign a global address to the monitored apparatus to which a local address has been assigned. This makes it possible to use global address resources more efficiently. For example, if each of the management protocol servers 60a and 60b has a global IP, any node located beyond each management protocol server can be managed without a global address. According to the example as shown in Fig. 10 of Applicant's disclosure, it is possible for MANAGER NODE 40 to also manage MANAGED NODEb 50b, even if MANAGED NODEb 50b has a private address L2 (210b) but does not have a corresponding global address defined by NAT (e.g., ADDRESS TRANSLATION BY NAT 230).

Although the claim scope varies, each of the independent claims (9, 19 and 28) has been amended to refer to a first network and a second network connected via an Internet Protocol (IP) Network Address Translator (NAT), and to require that the respective recited subject matter involves a translation or provides an address translation of a transmission source address, contained in a packet of management protocol transmitted from a monitored apparatus on the first network connected by the management protocol proxy, into a management address belonging to a third address system. The third address system is different from first and second address systems of the first network and the second network, respectively, which are defined by the NAT. In several of the dependent claims (10, 20 and 29) an address translation definition defines correspondence relationships between management addresses belonging to the third

address system and real addresses. It is respectfully submitted that neither of the combinations applied in the art rejections meet the above-noted requirements of the independent claims; and it is further submitted that neither of the combinations applied in the art rejections meet the above-noted requirements of dependent claims 10, 20 and 29.

Patentability over Denison and Boden

Denison describes in col. 1, lines 62-66 "Header and payload address translation operations are then performed to ensure that the IP address spaces of the incoming packets are made non-conflicting, such that the packets can be managed using a single network management platform." (underline added for emphasis.) Hence, Denison teaches translation of the header which is a communication destination address of a packet and the payload (which is an address on the management protocol data) so as to be adapted in "the IP address spaces". In other words, Denison teaches translation of the header and the payload by a single address system. It is noted here that the Denison's translation of the header is performed by the router 104, that is, translation by the NAT. Denison's translation of the payload is performed by the MPAT 102. The MPAT 102 translates IP address related information contained in the payload of SNMP type management protocol packets "in order to retain consistency" (see e.g. column 2, lines 59-67). Thus, the translation by the MPAT 102 is apparently a translation using the same address system as the NAT. For at least this reason, it is believed that Denison does not actually disclose or suggest "translation by a different address system than a NAT," as erroneously asserted in Item 5 of the Office Action. It is respectfully submitted that Denison fails to disclose or suggest that MPAT performs translation using a third address system different from the NAT address systems (global IP and local IP), as recited in the independent claims (9, 19 and 28) or use of an address translation definition defines correspondence relationships between management addresses

belonging to the third address system and real addresses as recited in several dependent claims (10, 20 and 29). Boden does not make up for these missing aspects of the disclosure of Denison.

The art rejection includes an allegation that Boden performs the address translation at the DNS, not at a NAT, and thus Boden's "addressing system is different from an address system defined by the NAT." It is respectfully submitted that this interpretation of Boden is incorrect. Fig. 2 of Boden shows the table 469 by which the address translation is performed at DNS 468. Boden's DNS actually has a function of NAT translation, that is to say, Boden's DNS performs NAT absolutely. For example, in Col. 9, lines 1-18 of Boden, there is description meaning that Fig. 3 shows address translation by NAT and Fig. 4 shows NAT having an IP masquerade function. Boden's DNS 468 implements these NAT functions. Thus, the DNS 468 of Boden does not perform address translation in which "the addressing system is different form an address system defined by the NAT", but merely performs translation in addresses defined by the NAT.

Moreover, Boden teaches translation of an address and a host name by DNS in addition to an address translation system by NAT. However, Boden fails to disclose or suggest the feature of Applicant's amended claims that "a transmission source address" is translated into "a management address" which is an address belonging to a third address system different from a local address (the first address system) and a global address (the second address system) both defined by the NAT.

Since neither Denison nor Boden fairly suggests the translation of the transmission source address, contained in a packet of management protocol, into a management address belonging to a third address system different from first and second address systems of the first network and the second network, respectively, defined by the NAT, the combination of Denison and Boden does not satisfy all aspects of any of the independent claims. It is therefore submitted that all of

the pending claims patentably define over the combination of Denison and Boden and the rejection over those documents should now be withdrawn.

Patentability over Crump and Boden

It is respectfully submitted that the claim requirements discussed above similarly distinguish the claimed subject matter over the proposed combination of Crump and Boden.

In the rejection (top of page 11 of the Detailed Action), the Examiner acknowledges that Crump does not expressly disclose that the management address belongs to an address system different from an address system defined by the NAT. As such, Crump would not satisfy the amended claim requirements regarding translation of a transmission source address, contained in a packet of management protocol, into a management address belonging to a third address system that is different from first and second address systems of the first network and the second network defined by the NAT. As discussed above, Boden does not provide a teaching of such a translation.

Since neither Crump nor Boden fairly suggests the recited translation of the transmission source address into a management address belonging to a third address system different from the address systems defined by the NAT, the combination of Crump and Boden does not satisfy all aspects of any of the independent claims. It is therefore submitted that all of the pending claims patentably define over the combination of Crump and Boden and the rejection over those documents should now be withdrawn.

Conclusions

For reasons discussed below, it is believed that all of the pending claims patentably distinguish over the art, particularly the art documents applied in the rejections in the latest

Office Action. Hence, all claims should be in condition for allowance. Applicant respectfully requests a prompt favorable reconsideration of this amended application.

It is believed that this response addresses all issues raised in the August 8, 2006 Office Action. However, if any further issue should arise that may be addressed in an interview or by an Examiner's amendment, it is requested that the Examiner telephone Applicant's representative at the number shown below.

To the extent necessary, if any, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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